

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JAMES SMITH, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

PENNSYLVANIA STATE EDUCATION  
ASSOCIATION,

Defendant.

NO. 1:25-cv-00513-JPW

CLASS ACTION

**JURY TRIAL DEMANDED**

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff James Smith (“Plaintiff”) hereby dismisses this action as follows:

1. All claims of Plaintiff, individually, are dismissed without prejudice;  
and
2. All claims of any unnamed member of the proposed class are  
dismissed without prejudice.

Each party shall bear their own fees and costs.

Dated: April 11, 2025

Respectfully submitted,

/s/ Bart D. Cohen

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*Counsel for Plaintiff and the Proposed  
Class*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via email on the following counsel, who has communicated to Plaintiff his representation of Defendant with respect to the matters encompassed in the above-captioned action.

John B. Consevage  
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Dated: April 11, 2025

/s/ Bart D. Cohen

Bart D. Cohen